

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

MADISON SQUARE BOYS & GIRLS CLUB,
INC.

Debtor.

Case No. 22 Civ. 7575 (KPF)

Appeal from:
S.D.N.Y Bankr.
Case No. 22-10910 (SHL)

**DECLARATION OF MATTHEW SEDIGH IN SUPPORT OF
MOTION FOR LEAVE TO WITHDRAW**

I, the undersigned, Matthew Sedigh, do hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the Chief Executive Officer of Xclaim Inc. (“*Xclaim*”).
2. Xclaim historically engaged Latham & Watkins LLP (“*Latham*”) to serve as its counsel in various matters. Among the matters in which Latham served as Xclaim’s counsel was the matter before the Bankruptcy Court for the Southern District of New York from which this appeal is taken, S.D.N.Y Bankr. Case No. 22-10910 (SHL) (the “*Appeal*”).
3. While Latham filed the Notice of Appeal (Docket No. 1) initiating this appeal on or about September 6, 2022, I subsequently notified Latham that Xclaim intended to use alternate counsel for purposes of the Appeal.
4. Xclaim consents to Latham’s withdrawal as counsel in the Appeal.
5. Xclaim will work diligently to secure new counsel for purposes of the Appeal in advance of the continued deadline for its Appellant Brief, presently due on January 30, 2023.

WHEREFORE, the undersigned respectfully requests that the Court enter an order relieving Latham as counsel of record for Xclaim in the above-captioned matter.

Dated: December 23, 2022
Los Angeles, California

DocuSigned by:

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Matthew Sedigh
Chief Executive Officer
Xclaim Inc.